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Formed in the State of PA
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ATTORNEY FOR MOVANT: CAPITAL ONE AUTO FINANCE, A DIVISION OF CAPITAL ONE, N.A.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON DIVISION**

IN RE:

LEONARD M OGLESBY, Debtor

§ CASE NO. 20-18767-MBK
§
§ CHAPTER 13
§
§ Hearing date: December 15, 2020@9:00
§ A.M.
§
§ **NOTICE OF MOTION TO VACATE**
§ **AUTOMATIC STAY**
§ **WITH WAIVER OF RULE 4001(a)(3)**

TO:

Brad J. Sadek
1315 Walnut Street, Ste 502
Philadelphia, PA 19107

Leonard M Oglesby
1813 Margerum Avenue
Lake Como, NJ 07719

Albert Russo
CN 4853
Trenton, NJ 08650

U.S. TRUSTEE
One Newark Center Ste 2100
Newark, NJ 07102

PLEASE TAKE NOTICE that on **Tuesday, December 15, 2020 at 9:00 A.M.**, or as soon as the matter may be heard, the undersigned, attorneys for Secured Creditor **Capital One Auto Finance, a division of Capital One, N.A.** its assignees and/or successors in interest, will move before the Honorable Michael B. Kaplan of the United States Bankruptcy Court, 402 East State Street, Trenton, NJ 08608 for the entry of an *Order Vacating the Automatic Stay* with respect to Debtor's 2010 HONDA CR-V-4 CYL. Utility 4D EX 4WD, V.I.N. 5J6RE4H56AL043980, and allowing Capital One Auto Finance, a division of Capital One, N.A. to continue or institute a repossession action, by reason of the Debtor's failure to make regular monthly payments to Capital One Auto Finance, a division of Capital One, N.A..

Respectfully Submitted,

Mester & Schwartz, P.C.
Attorney for Movant

Dated : November 19, 2020

/s/ Jason Brett Schwartz, Esquire
Jason Brett Schwartz, Esquire